

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION**

JEFFREY CARLOS HALE, on behalf of himself  
and all others similarly situated,  
Plaintiff,  
v.  
CNX GAS COMPANY, LLC,  
  
Defendant.

Case No. 1:10-cv-00059

DORIS BETTY ADDISON, on behalf of herself  
and all others similarly situated,  
Plaintiff,  
v.  
CNX GAS COMPANY, LLC,  
  
Defendant.

Case No. 1:10-cv-00065

**MOTION TO COMPEL**

Pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure, Plaintiffs respectfully move for an order compelling Defendant CNX Gas Company, LLC (“CNX”) to resume document production and to provide a privilege log. The grounds for this motion are set forth in the accompanying Memorandum in Support of Plaintiffs’ Motion to Compel, the Declaration of Daniel E. Seltz and accompanying exhibits, and any other submissions the Court may require.

Through this motion, the undersigned certifies that Plaintiffs’ counsel have in good faith conferred with counsel for CNX an attempt to resolve this dispute without court action.

Respectfully submitted,

Dated: October 3, 2014

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**CERTIFICATE OF SERVICE**

The undersigned counsel does hereby certify that he has this day served a true and correct copy of the above and foregoing on counsel of record via CM/ECF filing.

This the 3rd day of October, 2014.

/s/ Daniel E. Seltz

Daniel E. Seltz

Attorney for Plaintiffs